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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

19-CV-1388 *7/4/M*

Qian Chen

206 588 0129

Plaintiff(s),
v.

City of Seattle

Defendant(s).

CASE NO. _____
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: Yes No

L. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Qian Chen
Street Address	<u>7650 SE 27th ST, Apt 438</u>
City and County	<u>Mercer Island, King county</u>
State and Zip Code	<u>WA, 98040</u>
Telephone Number	<u>(206) 588-0129</u>

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1 B. Defendant(s)

2 Provide the information below for each defendant named in the complaint, whether the
3 defendant is an individual, a government agency, an organization, or a corporation. For an
4 individual defendant, include the person's job or title (if known). Attach additional pages if
needed.

5 Defendant No. 1

6 Name	<u>City of Seattle</u>
7 Job or Title (if known)	
8 Street Address	<u>820 Virginia ST</u>
9 City and County	<u>Seattle King County</u>
State and Zip Code	<u>WA, 98101</u>
Telephone Number	<u>(206) 684-2489</u>

10 Defendant No. 2

11 Name	
12 Job or Title (if known)	
13 Street Address	
14 City and County	
15 State and Zip Code	
16 Telephone Number	

17 Defendant No. 3

18 Name	
19 Job or Title (if known)	
20 Street Address	
21 City and County	
22 State and Zip Code	
23 Telephone Number	

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2 Defendant No. 4

3 Name _____

4 Job or Title (*if known*) _____

5 Street Address _____

6 City and County _____

7 State and Zip Code _____

8 Telephone Number _____

II. BASIS FOR JURISDICTION

9 Federal courts are courts of limited jurisdiction (limited power). Generally, only two
10 types of cases can be heard in federal court: cases involving a federal question and cases
11 involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under
12 the United States Constitution or federal laws or treaties is a federal question case. Under 28
13 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and
14 the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of
15 citizenship case, no defendant may be a citizen of the same State as any plaintiff.

16 What is the basis for federal court jurisdiction? (*check all that apply*)

17 Federal question Diversity of citizenship

18 Fill out the paragraphs in this section that apply to this case.

19 A. If the Basis for Jurisdiction Is a Federal Question

20 List the specific federal statutes, federal treaties, and/or provisions of the United States
21 Constitution that are at issue in this case.

22 _____
23 _____
24 _____

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1 **B. If the Basis for Jurisdiction Is Diversity of Citizenship**

2 **1. The Plaintiff(s)**

3 **a. If the plaintiff is an individual.**

4 The plaintiff (*name*) _____, is a citizen of the

5 State of (*name*) _____.

6 **b. If the plaintiff is a corporation.**

7 The plaintiff, (*name*) _____, is incorporated under
8 the laws of the State of (*name*) _____, is incorporated under
9 the laws of the State of (*name*) _____, and has its principal
10 place of business in the State of (*name*) _____.

11 *(If more than one plaintiff is named in the complaint, attach an additional page providing
the same information for each additional plaintiff.)*

13 **2. The Defendant(s)**

14 **a. If the defendant is an individual.**

15 The defendant, (*name*) _____, is a citizen of the
16 State of (*name*) _____, Or is a citizen of
17 (*foreign nation*) _____.

18 **b. If the defendant is a corporation.**

19 The defendant, (*name*) _____, is incorporated under
20 the laws of the State of (*name*) _____, and has its principal
21 place of business in the State of (*name*) _____.

22 Or is incorporated under the laws of (*foreign nation*) _____,
23 and has its principal place of business in (*name*) _____.

24 *(If more than one defendant is named in the complaint, attach an additional page
providing the same information for each additional defendant.)*

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1 **3. The Amount in Controversy.**

2 The amount in controversy—the amount the plaintiff claims the defendant owes or the
3 amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):
4 _____
5 _____
6 _____

7 **III. STATEMENT OF CLAIM**

8 Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as
9 possible the facts showing that each plaintiff is entitled to the damages or other relief sought.
10 State how each defendant was involved and what each defendant did that caused the plaintiff
11 harm or violated the plaintiff's rights, including the dates and places of that involvement or
conduct. If more than one claim is asserted, number each claim and write a short and plain
statement of each claim in a separate paragraph. Attach additional pages if needed.

12 _____
13 _____
14 _____

15 **IV. RELIEF**

16 State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do
17 not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing
at the present time. Include the amounts of any actual damages claimed for the acts alleged and
18 the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts,
and the reasons you claim you are entitled to actual or punitive money damages.

19 _____
20 _____
21 _____

22 **V. CERTIFICATION AND CLOSING**

23 Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my
24 knowledge, information, and belief that this complaint: (1) is not being presented for an improper

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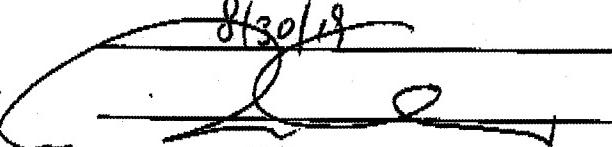
1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
2 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or
3 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so
4 identified, will likely have evidentiary support after a reasonable opportunity for further
5 investigation or discovery; and (4) the complaint otherwise complies with the requirements of
6 Rule 11.

7 I agree to provide the Clerk's Office with any changes to my address where case-related
8 papers may be served. I understand that my failure to keep a current address on file with the
9 Clerk's Office may result in the dismissal of my case.

10 Date of signing:

8/30/19

11 Signature of Plaintiff



12 Printed Name of Plaintiff

Qian Chen

14 Date of signing:

15 Signature of Plaintiff



16 Printed Name of Plaintiff

18 Date of signing:

19 Signature of Plaintiff



20 Printed Name of Plaintiff

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